

EC

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

Jeremiah Morrison
156 Midland Avenue
Columbus, Ohio 43223

Case No. 2:23-mj-522

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2023 to June 2023 in the county of Franklin County in the
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. 2251
18 U.S.C. 2252 and 2252A
18 U.S.C. 1466Advertisement/Solicitation for child pornography
Possession, distribution, and/or receipt of child pornography
Transportation of Obscenity

This criminal complaint is based on these facts:

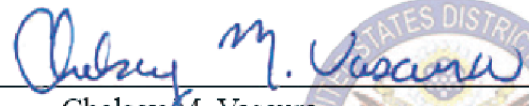
See attached affidavit incorporated herein by reference

☒ Continued on the attached sheet.*Complainant's signature*

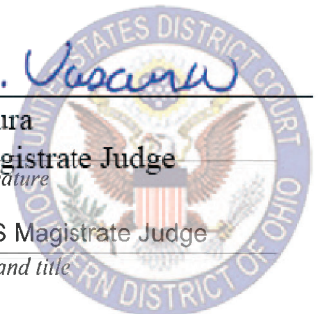
HSI TFO Damon Shanks

Printed name and title

Sworn to before me and signed in my presence.

Date: 9/19/2023City and state: Columbus, OhioChelsey M. Vascara
United States Magistrate Judge*Judge's signature*

Chelsey M. Vascara, US Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of:

United States of America

v.

Jeremiah Morrison

156 Midland Avenue

Columbus, OH 43223

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Case No.: 2:23-mj-522

Magistrate Judge Vascura

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Damon Shanks, a Task Force Officer with Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION

1. Your affiant has been employed with the Franklin County Sheriff's Office (FCSO) since 2016 and is assigned to the Franklin County Internet Crimes Against Children (ICAC) Task Force which investigates child exploitation and evidence pertaining to child sexual abuse material (CSAM). The bulk of your affiant's current responsibilities include investigating the possession, distribution, and production of material harmful to children and includes working in both an undercover capacity and covert nature. Your affiant makes this affidavit in support of a criminal complaint to arrest Jeremiah Morrison (MORRISON) for violations of Title 18 United States Code (U.S.C.) Sections (§§) 2251, 2252 and 2252A – the advertisement for/distribution/receipt, and/or possession of child pornography as well as 18 U.S.C. § 1466 – the transportation of obscenity.

2. Your affiant has been employed by HSI as a Task Force Officer (TFO) since September 2023. Your affiant also has specialized professional training in sexually and nudity-oriented matter involving children from the FCSO, Homeland Security Investigation (HSI), ICAC Task Force and other industry experts through formal and informal instruction. The information outlined in this affidavit comes through personal involvement in the investigation as well as information provided to me by other law enforcement officers, electronic service providers such as Discord, Inc., and the National Center of Missing and Exploited Children.

3. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that MORRISON committed the violation listed above.

FACTS SUPPORTING PROBABLE CAUSE

4. In April 2023, your affiant received information pertaining to an individual by the name of Jeremiah MORRISON who was believed to have uploaded child pornography online after having sustained a previous conviction for a crime against a minor child. MORRISON was currently residing in Columbus, Ohio. Your affiant subsequently obtained reports from the NCMEC and Franklin County regarding the current and previous investigation of MORRISON that had been conducted thus far.

5. On or about January 21, 2023, a CyberTipline report was submitted to the National Center for Exploited Children (NCMEC) by Discord, Inc. regarding the uploading of child pornography to the Discord account by Screen/Username “Bigman1888#5598” with a registered email address of kmyass960@gmail.com. According to the information that was provided by Discord, on January 21, 2023, three separate files depicting child pornography were uploaded via the “Bigman1888#5598” Discord account. The CyberTipline report indicated all three files were identified using the MD5 hash matching method¹. Copies of the child pornography files were included with the CyberTipline report along with information pertaining to the IP address utilized to access the account at the time the suspect files were uploaded. A summary of those images is as follows:

- One image titled chat1.jpg depicting a prepubescent male lying upside down on a bed, on his back while his head hangs off the edge of the bed. An adult male is observed inserting his erect penis into the minor’s mouth.

¹ A hash value is “an algorithmic calculation that yields an alphanumeric value for a file.” *United States v. Stevenson*, 727 F.3d 826, 828 (8th Cir. 2013). Hash values have been referred to as a “unique digital fingerprint,” *United States v. Sosa-Pintor*, 741 Fed. Appx. 207 (5th Cir. 2018), and are “regularly used to compare the contents of two files against each other.” *United States v. Reddick*, 900 F.3d 636, 637 (5th Cir. 2018). Because only two identical files will return the same hash value, both law enforcement and private cloud storage companies use hash matching to identify and attempt to thwart the spread of child pornography material on the internet. *Id.* at 637-638.

- One image titled chat6.jpg depicting a prepubescent male sitting on a floor fully nude, leaning back on his elbows, with his legs spread apart, exposing his penis and testicles.
- One image titled chat12.jpg depicting a prepubescent nude male, standing in front of an adult male, with no pants on. The prepubescent male has both of his hands wrapped around the adult male's erect penis as he inserts the penis into his mouth.

6. The investigation revealed that the IP address used to upload the child sexual abuse material was geolocated to Columbus, Ohio. More specifically, the IP address 174.105.20.121 resolved to the internet service provider Spectrum with a subscriber name of Jeremiah MORRISON at the address of 156 Midland Avenue, Columbus, Ohio.

7. On April 10, 2023, a search warrant for the Discord “Bigman1888#5598” username was obtained. Three days later, the results of that warrant were received by your affiant which revealed the three files noted above originally flagged by the NCMEC. In addition, six video files were recovered from the account, all of which depicted child sexual abuse material.

8. Legal process was served to Spectrum for IP address 174.105.20.121 related to documented subscriber information. In a return response, the subscriber was listed as Jeremiah Morrison at Midland Avenue in Columbus as noted above. In addition, an email address of jeremiahmorrison.409@gmail.com and a telephone number of (614) 603-8376 were provided.

9. In further investigation into MORRISON, your affiant learned via an open-source search on the Ohio sex offender registry and Franklin County Criminal Docket that Jeremiah MORRISON was a Tier II registered sex offender and had listed his residence as 156 Midland Avenue in Columbus, Ohio. More specifically, MORRISON had been convicted of Voyeurism of a Minor, in violation of Ohio Revised Code Section 2907.08, under case number 11CR6000 on March 30, 2012. The background information pertaining to that case revealed that on November 2, 2011, an approximately 11-year-old male (herein after referred to as Minor Victim) was using the restroom at the Columbus Metropolitan Library. While going to the bathroom, the minor victim noticed a cellphone under the divider which appeared to be taking photos and videos of him. Minor Victim immediately exited the restroom and library management was notified. As MORRISON exited the restroom, he was confronted by library security and identified by Minor Victim and subsequently detained at the library. MORRISON made admissions that he was videotaping the Minor Victim in the stall and that these types of videos

arouse him and that he watches them while masturbating. MORRISON further admitted that he deleted the videos of the Minor Victim off his phone, but other child pornography would be on there. On March 30, 2012, MORRISON was sentenced to one year imprisonment and was required to continue to register as a Tier II sex offender. Of note is that at the time he committed the Voyeurism of a Minor offense in Franklin County, he was already a registered sex offender. More specifically, MORRISON had been convicted of Voyeurism, in violation of Ohio Revised Code Section 2907.08, under case number 08CR337 on May 23, 2008, which required him to register as a Tier II sex offender initially. MORRISON had been sentenced to one year incarceration in that matter as well.

10. On June 21, 2023, a Franklin County search warrant was obtained for the residence of MORRISON at 156 Midland Avenue in Columbus, Ohio. That search warrant was executed on June 22, 2021, and when law enforcement arrived on scene, MORRISON was present at the address. Recovered at the residence were numerous digital media devices including a Samsung Galaxy A32 cellular phone belonging to MORRISON. MORRISON was placed under arrest for violations of Ohio Revised Code related to Pandering Sexually Oriented Material Involving a Minor (a felony in the second degree) and transported back to the Franklin County Sheriff's Office Detective Bureau at 410 South High Street in Columbus, Ohio. After being advised of his *Miranda* rights, MORRISON made admissions that his cellphone would contain child sexual abuse material and that he was the sole user of the email address which was used to create the Discord account which he utilized to send and receive child pornography. MORRISON provided his passcode to the cell phone and further admitted to having conversations on Discord with other individuals he believed to be minors.

11. A forensic review of the Samsung Galaxy A32 revealed approximately 3,000 images and 900 videos of child sexual abuse material which generally depicted prepubescent and toddler aged or infant children engaged in sex acts with adults including oral, anal, and vaginal intercourse, subjected to sadistic and masochistic abuse, bestiality, masturbation, and the lascivious exhibition of their genitalia, anus, and pubic region. For example, one video titled "Babygirl-Lexxa-cum-" depicted a nude infant female approximately less than three months old lying on her back on a bed with a black rope bound around the infant's wrists, neck, and ankles. A blanket is placed over the infant's eyes and a pacifier is in the infant's mouth. An adult male is observed masturbating over her and using his hands to manipulate and expose her vagina. The

adult male is observed moving closer to the infant's vagina and ejaculates into the vagina of the infant. The adult male is then observed using his fingers to push the semen into the vagina and mouth of the infant.

12. In addition to the child sexual abuse material recovered on the device, numerous images and videos depicting the torture, mutilation, and deceased children were recovered. For example, one image titled 597.jpg depicted what appears to be a teenage female wearing only underwear with her chest exposed sitting up on her knees with her legs spread on a white sheet laid out on a floor. Her arms are outstretched in front of her. In front of her is an approximately one year old female. The one-year-old female is suspended upside down from her legs, which are spread, by an apparatus which is not shown in the photo. Her arms are outstretched and are bound to an object on the floor. Her mouth is duct taped around her head. Red close pins are closed and sinching down on both of her nipples and at least one of the lips of her vagina. Her face appears to be a blueish/purple which appears to be from blood rushing to her head from prolonged exposure to being suspended upside down. The outstretched hands of the teenage female, one on each side of the infant's leg closest to her, are seemingly helping balance the infant on her head. In another image, titled 1h0btodeb.jpg, a female child approximately 6 years old is depicted lying on her back in the nude on a metal table on her back with her breasts exposed. The table is covered in blood and surgical tools. The child's hands appear to have been removed and are not in the photo. Her torso, beneath her breasts has multiple vertical lacerations. Her head has multiple lacerations, has been severed from her body at the neck and is sitting next to her corpse. Her face has multiple lacerations and bruising.

13. A forensic review and analysis of the Samsung device also revealed the Session mobile application was installed and logged into by MORRISON. Within the Session application, numerous chat messages were recovered during which, MORRISON claimed he had previously drugged, raped, molested, and recorded several children he babysat as well as family members he had access too. MORRISON further claimed in these communications that the computer he created this content had been destroyed and he no longer had access to the images and videos he created. MORRISON further indicated he was grooming the granddaughter of his neighbor and asked a Session user if that user would be interested in helping him drug and rape the neighbor's granddaughter.

14. In addition, chat messages were recovered from the Discord application occurring in January 2023 with Discord User ID 8b46a206#0517 (herein after referred to as Unknown User). The following is an excerpt from that communication between MORRISON and Unknown User:

Unknown User:	Yo wassup
MORRISON:	what ages do you like most
Unknown User:	Around 7-10
MORRISON:	Ok let me look through what I have
Unknown User:	Id love to fuck my brother
MORRISON:	Mmmm nice how old is he
Unknown User:	10
Unknown User:	I'm 16
MORRISON:	Nice
MORRISON:	Got any pics of his ass or dick
Unknown User:	No nude pics sadly
Unknown User:	He knows that it's wrong
MORRISON:	Or do you have a mask you can put on him so I can see his whole body
Unknown User:	I got a pic
MORRISON:	Oh ok
Unknown User:	They used to walk around in just underwear

At that point in the conversation, Unknown User distributed one file to MORRISON via Discord. The contents of that file were not able to be retrieved. The conversation then continued as followed:

MORRISON:	Nice
Unknown User:	The one standing is my sister
MORRISON:	Nice I love little girls too
MORRISON:	How old are they in the pic
Unknown User:	7 and 5
MORRISON:	Nice
Unknown User:	So can I see you boy vids?
MORRISON:	I posted everything I can send on here to the new channel

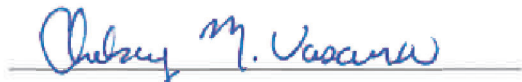
15. Based upon the above information, your affiant submits that there is probable cause to believe that Jeremiah MORRISON has committed offenses in violations of Title 18 United States Code (U.S.C.) Sections (§§) 2251, 2252 and 2252A – advertisement for/distribution/receipt, and/or possession of child pornography as well as 18 U.S.C. § 1466 –

transportation of obscenity. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.



Damon Shanks
Task Force Officer
Homeland Security Investigations

SWORN AND SUBSCRIBED TO BEFORE ME THIS 19th DAY of September, 2023.



Chelsey A. Vascara
Magistrate Judge
U.S. District Court for the Southern District of Ohio